

**IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS
CIVIL DIVISION**

DAVID FILLMORE

PLAINTIFF

V.

CASE NO. 60CV-20-_____

G4S SECURITY SOLUTIONS (USA), INC.

DEFENDANT

COMPLAINT

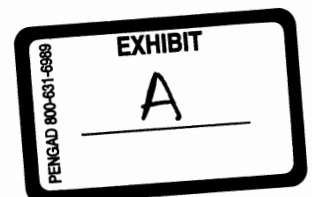
Comes now the Plaintiff, David Fillmore, by and through his attorney, Floyd A. Healy, and for his Complaint against the Defendant, G4S Security Solutions (USA), Inc., states:

1. That the Plaintiff is a resident of Pulaski County, Arkansas. Plaintiff has been so situated for all times referenced hereinbelow.

2. That the Plaintiff verily believes and therefore alleges that the Defendant is a corporation existing under and pursuant to the laws of the State of Arkansas with the facility located at 425 West Broadway, Suite K, North Little Rock, Arkansas, 72114.

3. That jurisdiction and venue are proper in this Court per Title VII of the Civil Rights Act of 1964, codified as 42 U.S.C. §§ 2000e to 2000e-17 and *Arkansas Code Annotated* §16-123-107.

4. That the Plaintiff was hired by the Defendant on or about October 24, 2017, as a Area Supervisor. At all times pertinent hereto, the Plaintiff was employed by the Defendant as a Area Supervisor.



5. That in January of 2018, Plaintiff advised Steven Willis, General Manager and Plaintiff's immediate supervisor, that he was interested in a Site Supervisor position that would be coming open in the future at a Company called MISO. This position was desirable to the Plaintiff because it had a better salary than his current position and he wanted a better work environment.

6. That in early January 2018, after a staff meeting, Steven Willis announced that the Plaintiff would be leaving G4S to take the Site Supervisor position at MISO. Plaintiff began to prepare for his new position and had assembled most of his staff.

7. That on or about January 30, 2018, Steven Willis requested an updated resume from Plaintiff. After reviewing Plaintiff's updated resume, Steven Willis advised the Plaintiff that there had "been a mistake" and asked Plaintiff to read a copy of the CPO Requirement list. Plaintiff was then asked if he felt he was qualified for the position.

8. That on April 4, 2018, Plaintiff was told by Joseph Bickford, the Regional Manager, that Joseph Bickford was unsure of Plaintiff's background and qualifications for CPO and that Joseph Bickford was going to request Plaintiff's file for review.

9. That after review of Plaintiff's file, Plaintiff learned that the position had been given to a white male.

10. That Plaintiff verily believes and therefore alleges that he was phased out of the position as retaliation and discrimination due to his past grievances and his race.

11. That on October 5, 2018, Plaintiff sent Joseph Bickford an email to point out to him that Plaintiff's grievances were never addressed by Defendant. Joseph Bickford's

response to Plaintiff's email was "I will not tolerate you questioning my integrity and if you find working for me and Steven appalling, then I encourage you to find other employment".

12. That on October 12, 2018, Plaintiff was informed by Joseph Bickford that GS4 was going through a "financial restructure" and that the Plaintiff and a co-worker, who was also a black male, would be doing overhead work in the office two days a week and working three days a week out in the field as a result of the financial restructure.

13. That on October 16, 2018, Plaintiff discovered that G4S, while financially restructuring, had paid for hotel accommodations, a rental car, and provided per diem pay for a coworker for out-of-town training.

14. That on October 16, 2018, Plaintiff was forced to resign his position at G4S.

15. That the Plaintiff has exhausted all administrative remedies and has received from the Equal Employment Opportunity Commission a Right to Sue letter. A copy of said letter is attached hereto marked Exhibit "A" and incorporated herein by reference.

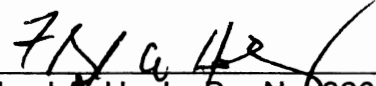
16. Plaintiff is requesting an award of back pay, interest on back pay, costs of litigation, reasonable attorney's fees, and any and all other damages available to him per the Arkansas Civil Rights of 1993, as well as Title VII of the Civil Rights Act of 1964.

17. That Plaintiff demands a trial by jury.

WHEREFORE, Plaintiff requests that the be awarded judgment against the Defendant, for all relief set forth hereinabove, for all costs and fees associated with the

pursuit of this matter, for full recovery of compensatory and punitive damages, and for all other just and proper relief as determined by this Court.

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By: 
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